

EXHIBIT B

LOLA ALEXANDER

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<p>1 EXAMINATION BY MS. SCAPICCHIO</p> <p>2 Q. Hi, Ms. Alexander, I'm Rose Scapicchio. I 3 represent Shawn Drumgold. I have just a 4 couple of questions.</p> <p>5 Since we took that five-minute 6 break late in the afternoon, did you have an 7 opportunity to review the affidavit with your 8 signature on it and your testimony at the 9 motion for a new trial which is about 56 10 pages of testimony? Did you review that?</p> <p>11 A. Yeah, I looked at it, yeah.</p> <p>12 Q. You looked at it.</p> <p>13 Did you have enough time to review 14 it?</p> <p>15 A. No, I didn't, no.</p> <p>16 Q. Okay. Did you want some more time to review 17 that?</p> <p>18 A. I don't think it's necessary.</p> <p>19 Q. Okay. When you testified at the motion for 20 new trial hearing, it's fair to say no one 21 told you what to say, right?</p> <p>22 A. Right.</p> <p>23 Q. You answered the questions under oath to the 24 best of your ability?</p>	<p>1 police -- when you said this in court in 2 2003, that was true, right?</p> <p>3 A. Yes, it was.</p> <p>4 Q. Okay. And you remembered having a 5 conversation with the police telling them 6 about Mary's brain cancer, right?</p> <p>7 A. Yes.</p> <p>8 Q. And about her memory problems, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And then do you also remember 11 testifying at the motion for new trial that 12 not only had Mary been shown photographs at 13 your house, but she had been brought to the 14 police station and shown photographs?</p> <p>15 A. Yeah, I --</p> <p>16 Q. Okay.</p> <p>17 A. -- remember that, yeah.</p> <p>18 Q. And at some point in time, when the police 19 came to your house, do you remember 20 testifying that you'd asked them to stop 21 coming by?</p> <p>22 A. I sure did.</p> <p>23 Q. Okay. And can you describe or do you recall 24 describing for the Court back in 2003 what</p>	
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<p>1 A. Yes.</p> <p>2 Q. And you told the truth when you were 3 testifying under oath?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And when you were asked to explain to 6 the Court what you told the officers about 7 your daughter's health, do you remember 8 telling the Court what you told the officers 9 about your daughter's health?</p> <p>10 A. No, I don't remember that.</p> <p>11 Q. Do you remember ever telling the Court at 12 page 15, I spoke with detectives as they came 13 to my house numerous times, and I asked them 14 not to harass my daughter, not to harass 15 her, but not to keep coming by my house 16 bothering my daughter because my daughter was 17 real sick, and she don't remember things, and 18 I said that put more pressure on my 19 daughter's head to try to be aggravated with 20 something that went on out on the street 21 which she didn't know anything about (reading 22 document)? Do you remember answering that --</p> <p>23 A. I remember saying that, yes, I do.</p> <p>24 Q. And that's true?</p>	<p>1 conditions Mary was suffering from, in other 2 words, what her -- what her symptoms were of 3 the brain cancer back in 2003 when you 4 testified?</p> <p>5 That's a bad question let me try 6 it again.</p> <p>7 Do you remember -- when the police 8 officers were asking Mary questions about the 9 Tiffany Moore murder, do you remember what 10 her physical condition was back then?</p> <p>11 A. I -- I can't remember.</p> <p>12 Q. Okay. But you remember that she had some 13 memory problems, is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Can you give us any examples of her 16 memory problems?</p> <p>17 A. Sometimes she couldn't even remember her 18 phone number or she can put her purse down 19 and don't remember where she put it, that 20 quick or whatever, you know.</p> <p>21 Q. And was there an incident where she couldn't 22 remember her son's name?</p> <p>23 MR. CURRAN: Objection.</p> <p>24 MR. ROACHE: Objection.</p>	
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<p>1 A. Yes.</p> <p>2 Q. Okay. And do you remember me asking if you 3 had any other discussions with the police 4 officers regarding your daughter's memory and 5 her ability to remember things? Do you 6 remember me asking you that?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. And do you remember testifying under 9 oath, then, that you said to them from the 10 beginning that when they first started 11 questioning my daughter that my daughter's 12 memory wasn't good because she had malignant 13 cancer of the brain and she didn't need any 14 more pressure on her; she didn't remember 15 from one day to the other or from one 16 incident to the other that happened during 17 the day (reading document)? Do you remember 18 testifying to that?</p> <p>19 A. Yes.</p> <p>20 Q. Do you have a specific memory of telling the 21 police officers that about Mary's condition?</p> <p>22 A. About -- rephrase that?</p> <p>23 Q. Sure.</p> <p>24 Do you remember telling the</p>	<p>1 MS. HARRIS: Objection.</p> <p>2 MR. WHITE: Objection.</p> <p>3 BY MS. SCAPICCHIO:</p> <p>4 Q. All right. Let me ask you this: Were there 5 any occasions where her memory got 6 significantly worse?</p> <p>7 A. I don't remember. I can't say.</p> <p>8 Q. Okay. Do you remember ever telling any 9 investigator that there were occasions when 10 Mary couldn't remember her own son's name?</p> <p>11 A. I think so, yeah.</p> <p>12 Q. Okay. So you remember saying that to an 13 investigator?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And --</p> <p>16 A. Yes.</p> <p>17 Q. And that concerned you quite a bit about 18 Mary's memory loss; is that fair to say?</p> <p>19 A. Fair to say.</p> <p>20 Q. Okay. And you sort of -- well let me ask you 21 this: While that was happening, did you try 22 to protect Mary from further investigation by 23 the police?</p> <p>24 A. No, I didn't.</p>	

1 Q. Okay. So you didn't do anything when they  
2 came to your house to stop them from speaking  
3 to her?  
4 A. No, I don't remember. I don't remember.  
5 Q. Okay.  
6 A. I don't remember.  
7 Q. All right. And other than the memory  
8 problems, did you testify that she also had  
9 headaches?  
10 A. Yeah, she had severe headaches.  
11 MR. CURRAN: Do you have a time  
frame there?  
12 MS. SCAPICCHIO: Okay.  
13 MR. CURRAN: Time frame in regards  
to, for one, all this was happening, I  
mean --  
14 MS. SCAPICCHIO: Well let me ask  
it again.  
15 BY MS. SCAPICCHIO:  
16 Q. When did Mary first start having headaches,  
do you remember?  
17 A. I can't remember.  
18 Q. Okay. Sometime after Tiffany Moore was  
killed on August 19th of 1988, do you

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1 A. Not that I can remember. That's all I can  
remember, those severe headaches.  
2 Q. Okay. And for how long a period of time did  
3 she have the severe headaches before she got  
4 diagnosed with the brain cancer?  
5 A. I can't remember that.  
6 Q. Okay. Do you remember whether or not when  
7 she had these headaches they were also  
8 accompanied by some memory loss?  
9 MR. ROACHE: Objection.  
10 BY MS. SCAPICCHIO:  
11 Q. You can answer.  
12 A. Yes.  
13 Q. Okay. And when you testified at the motion  
14 for new trial hearing in 2003, do you  
15 remember me asking you --  
16 MS. SCAPICCHIO: This is page 12.  
17 Q. -- and did you have any conversations with  
18 Boston police detectives and specifically  
19 Detective Murphy regarding your daughter's  
20 treatment at these medical centers (reading  
21 document)?  
22 Do you remember being asked about  
23 Mary's treatment at the medical centers at

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1 remember Mary having headaches at all?  
2 MR. CURRAN: Again, time frame.  
3 After until her death? I mean, when? I mean  
4 that's one of the key and critical issues in  
5 this case, so it's the memory of this witness  
6 in regards to the time frame which is when  
7 this is occurring.  
8 MS. SCAPICCHIO: Right.  
9 MR. CURRAN: So you're saying  
10 from X all the way to the present?  
11 MS. SCAPICCHIO: I didn't say all  
12 the way to the present.  
13 MR. CURRAN: That's what's implied  
14 by the question. If you just --  
15 MR. ROACHE: Object to the form.  
16 MR. CURRAN: -- narrow -- okay.  
17 MS. SCAPICCHIO: Is there an  
18 objection?  
19 MR. CURRAN: Yeah, there's an  
20 objection.  
21 MR. ROACHE: Objection.  
22 MS. SCAPICCHIO: All right.  
23 BY MS. SCAPICCHIO:  
24 Q. Let me ask you another question,

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1 the motion for new trial hearing in 2003?  
2 A. No, I don't remember.  
3 Q. Do you remember answering back, then, that  
4 you said that you told both detectives about  
5 her being treated at the Boston Medical  
6 Center and the Carney Hospital?  
7 MR. ROACHE: Objection.  
8 MR. CURRAN: Objection  
9 MR. WHITE: Objection.  
10 MS. HARRIS: Objection.  
11 A. I don't remember.  
12 Q. All right, I'm going to show you page 12 of  
13 your testimony at the motion for new trial  
14 hearing, and I'm going to ask you to read it  
15 to yourself (handing document).  
16 A. Well, I don't remember --  
17 Q. No, no, just read it to yourself.  
18 A. Read what? All of it?  
19 Q. Yes.  
20 A. (Reading document) I don't know. They  
21 said --  
22 Q. No, no, just to yourself, Mrs. Alexander.  
23 A. Oh.  
24 (Pause )

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1 Mrs. Alexander. Do you remember testifying  
2 at the motion for new trial hearing in 2003  
3 and explaining to the judge the problems that  
4 Mary was having with headaches?  
5 A. Yes, I remember that.  
6 Q. Okay. And do you remember what you used to  
7 do to assist her when she had those problems  
8 with headaches?  
9 MR. ROACHE: Objection.  
10 BY MS. SCAPICCHIO:  
11 Q. Go ahead, you can answer.  
12 A. I used to sit and hold her head in my lap.  
13 Q. Okay. And for how long a period of time  
14 would you have to sit and hold her head in  
15 your lap while she was having headaches?  
16 A. It would be hours.  
17 Q. So you indicated that sometimes you'd have to  
18 hold Mary's head in your lap for hours while  
19 she had headaches?  
20 A. Yes.  
21 Q. Okay. And would she have other symptoms when  
22 she had headaches other than, you know, a  
23 headache? Would there be any other physical  
24 symptoms that she would --

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1 Q. Did you have a chance to read page 12 of your  
2 motion for new trial testimony?  
3 A. (No response)  
4 Q. On page --  
5 A. Yes.  
6 Q. Okay. Does it refresh your memory at all as  
7 to whether or not you told the Court back in  
8 2003 that you told both detectives about your  
9 daughter's condition and treatment at these  
10 medical centers?  
11 A. That don't refresh my memory.  
12 Q. It doesn't?  
13 A. No.  
14 Q. Okay. So when you testified in 2003, nobody  
15 told you what to say about --  
16 A. No.  
17 Q. -- your daughter, right?  
18 A. They didn't.  
19 Q. Okay. And you testified under oath back  
20 then, right?  
21 A. Yes.  
22 MR. CURRAN: Objection.  
23 BY MS. SCAPICCHIO:  
24 Q. And you had no reason to do anything other

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than tell the truth, is that right?  
 A. Right.  
 MR. WHITE: Objection.  
 MS. SCAPICCHIO: I don't have any further questions.  
 MR. CURRAN: Could we just have that marked as an exhibit, the transcript that you had her review and the other --  
 MS. SCAPICCHIO: I think it already is. We did.  
 MR. CURRAN: Oh, did we? Okay, sorry.  
 MR. ROACHE: Mrs. Alexander, I have just a couple of questions. I know it's a long day, and I know you're tired as we all are. I will be brief.  
 FURTHER EXAMINATION BY MR. ROACHE  
 Q. Back in August of 1988 when you heard the shots that evening, who was in the house with you?  
 A. No one.  
 Q. Okay. And do you recall what time it was that you heard the shots?  
 A. No, sir.

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A. J-E-L-A-Y-A.  
 Q. And she's 10 years old?  
 A. I think she's 10.  
 Q. And Jerry, is that Gerald, Gerard or --  
 A. Jerry, J-E-R-R-Y.  
 Q. Okay. And Jerry is 16?  
 A. I think he's 16.  
 Q. And both Jerry and Jelaya live with Yolanda?  
 A. Yes.  
 Q. And does anyone else live currently with Yolanda?  
 A. Not as I know of.  
 Q. Okay. And where does Jerry attend school?  
 A. I don't know.  
 Q. When is the last time you saw Jerry?  
 A. About month and a half ago.  
 Q. And you don't know if he attends school?  
 A. I don't know where he attends school at.  
 Q. I asked you if he attends school.  
 A. Yeah, he attends school.  
 Q. But you don't know what school he attends?  
 A. No, sir.  
 Q. Okay. And Jelaya, what school does she attend?

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Q. Okay. Now where was Carla that night?  
 A. I don't know.  
 Q. Was she living on Homestead Street with you?  
 A. No, sir.  
 Q. Okay. Where was Yolanda when the shots -- when you heard the shots?  
 A. I don't know.  
 Q. Okay. Yolanda was born in February 1969, is that correct, February 20th, 1969?  
 A. Yes, sir.  
 Q. So Yolanda was 19 years of age at the time of the shooting of Tiffany Moore?  
 A. If you say so.  
 Q. Okay. Was Yolanda living with you on Homestead Street in 1988?  
 A. No, sir.  
 Q. Where was she living?  
 A. I don't know.  
 Q. How long had -- how long before the shooting did she stop living with you?  
 A. Yolanda had not been living with me for a long time.  
 Q. For a long time?  
 A. Yes.

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A. I don't know.  
 Q. You don't know?  
 A. No.  
 Q. When's the last time you saw Jelaya?  
 A. Same time I did Jerry, about a month, a month and a half ago.  
 Q. About a month and a half ago, okay.  
 Now Kenya back in 1988 was 13 years of age. Where was he that night that Tiffany Moore was killed?  
 A. I don't know if -- I told you before when you asked me that question, I think I might have sent them away because when summertime comes, I usually send the smaller ones out to go down South.  
 Q. Yeah, but Kenya was 13 that year. Did you send him down South when he was 13?  
 A. When I say -- yes, Kenya, Rico, and Jamarr.  
 Q. Okay. What school was Kenya attending in 1988 or '89?  
 A. I don't know, but he was attending school. I don't know.  
 Q. Do you know what grade he was in?  
 A. No, I sure don't.

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Q. Okay.  
 A. Yeah.  
 Q. How old was Yolanda when she moved out of your home?  
 A. I can't remember that.  
 Q. Was she in high school?  
 A. No, she wasn't.  
 Q. Did she go to high school?  
 A. Yes, she did.  
 Q. What high school did she go to?  
 A. Alabama.  
 Q. Alabama?  
 A. Yeah.  
 Q. And was she living in Boston in 1988 when Tiffany Moore was shot?  
 A. I can't remember that.  
 Q. Okay. Now you said that Yolanda has two children?  
 A. Now she does, yes, sir.  
 Q. She has two children.  
 A. And what are their names and ages?  
 A. Jerry is 16, I think, 16. I think Jelaya --  
 I think she's 10.  
 Q. How do you spell Jelaya?

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Q. And he wasn't at home on August 19th, 1988, at the time you heard the shots?  
 A. None of my little kids were there.  
 Q. Okay. And Delrico in 19- -- on August 19th, 1988, was nine years of age, is that correct?  
 A. I don't know. If that's your figure. I can't think of -- you know, back there.  
 Q. Okay. Well correct me if I'm wrong, but Delrico's date of birth was July 29th, 1979.  
 A. Yes.  
 Q. So in August of 1988, that would make him nine years of age?  
 A. If you say so.  
 Q. Okay. I think my math's pretty good.  
 A. Mm-hmm, but mine sure ain't.  
 Q. Okay. What school was Delrico attending in 1988 or 1989?  
 A. I don't know.  
 Q. What grade was Delrico in in September of 1989?  
 A. I don't know.  
 Q. What grade was Delrico in in September of 1988?  
 A. I don't know.

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